

OCT 30 2019

October 29, 2019

Tracking Number 1Z865F5F0194547236

Mr. Mark Gorog
PADEP – Bureau of Air Quality Control
Southwest Regional Office
400 Waterfront Drive
Pittsburgh, PA 15222

Re: NSPS 0000a Annual Compliance Report
August 2, 2018 – August 2, 2019
ETC Northeast Field Services, LLC - Pike Compressor Facility

Dear Sir:

ETC Northeast Field Services, LLC¹ (ETC) is submitting this letter to meet the annual reporting requirement of New Source Performance Standard 40 CFR 60, Subpart 0000a (NSPS 0000a) for its affected facilities at the Pike Compressor Facility.

The compliance period for the NSPS 0000a reciprocating compressor affected facilities at the Pike Compressor Facility began on August 2, 2018 and ended on August 2, 2019. In accordance with §60.5420a(b), the annual report is due 90 days after the end of the compliance period (i.e., October 31, 2019).

This annual report covers the compliance period from August 2, 2018 and ended on August 2, 2019.

I. General Information (§60.5420a(b)(1))

(1) The company name and address of the affected facility.

Mailing Address: 6051 Wallace Rd Ext., Suite 300, Wexford, PA 15090
Facility Location: Pike Compressor Facility, 282 Teets Road, Rochester, PA 15074
(Latitude: 40.74486, Longitude: -80.17000)

(2) An identification of each affected facility being included in the annual report.

The attached reciprocating compressor summary table contains identification of each NSPS 0000a affected facility.

(3) Beginning and ending dates of the reporting period.

This report covers the period from August 2, 2018 and ended on August 2, 2019.

¹ Energy Transfer Partners, L.P. (ETP, ultimate parent company of ETC) acquired the Pike Compressor Station and its associated NSPS 0000 affected facilities in a 2017 transaction which purchased Cardinal PA Midstream, LLC (Cardinal). ETP subsequently changed Cardinal's legal entity name to ETC Northeast Field Services, LLC but retained its Federal Employer Identification Number (FEIN).

(4) Certification by a responsible official of truth, accuracy, and completeness

Certification statement included at closing of this letter.

II. RECIPROCATING COMPRESSORS (§60.5420a(b)(4))

- (1) The cumulative number of hours of operation or the number of months since initial startup, since October 15, 2012, or since the previous reciprocating compressor rod packing replacement, whichever is later.**

Please refer to the attached reciprocating compressor summary table.

- (2) Records of deviations that occurred during the reporting period.**

No deviations occurred during the reporting period.

III. PNEUMATIC CONTROLLERS (§60.5420a(b)(5))

- (1) An identification of each pneumatic controller constructed, modified or reconstructed during the reporting period, including the identification information specified in §60.5390(b)(2) or (c)(2).**

ETC did not commence construction of any gas-actuated continuous bleed pneumatic controller affected facilities during the reporting period.

- (2) If applicable documentation that the use of pneumatic controller affected facilities with a natural gas bleed greater than 6 standard cubic feet per hour are required and the reasons why.**

ETC did not commence construction for any gas-actuated continuous bleed pneumatic controllers utilizing the functional need exemption of 40 CFR 60.5390(a) during the reporting period.

- (3) Records of deviations that occurred during the reporting period.**

No deviations occurred during the reporting period.

Should you have any questions or require additional information, please contact Doug Frisco at (570) 505-3700 or Patty Centofanti of Trinity Consultants at (412) 538-8038.

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*This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.*

Sincerely,

*Stephen Schuman*

Stephen D. Schuman  
VP Operations – East Division

Attachments

cc: **US EPA Region III, Air Protection Division**  
Office of Air Enforcement & Compliance - NSPS  
1650 Arch Street (3AP00), Philadelphia, PA 19103  
Tracking Number 1Z865F5F0190205095

# List of Affected Facilities §60.5420a(b)

| Facility Name            | Legal Entity                     | Latitude  | Longitude  | State        | County | Municipality           | Region     | Affected Facilities      |                      |                                      |               |   | Group of Equipment within a Process Unit <sup>1</sup> | Collection of Fugitive Emission Components at a Compressor Station |
|--------------------------|----------------------------------|-----------|------------|--------------|--------|------------------------|------------|--------------------------|----------------------|--------------------------------------|---------------|---|-------------------------------------------------------|--------------------------------------------------------------------|
|                          |                                  |           |            |              |        |                        |            | Reciprocating Compressor | Pneumatic Controller | Pneumatic Pump at a Processing Plant | Storage Tanks |   |                                                       |                                                                    |
| Pike Compressor Facility | ETC Northeast Field Services LLC | 40.744858 | -80.170000 | Pennsylvania | Beaver | New Sewickley Township | PADEP SWRO | X                        | --                   | --                                   | --            | X | --                                                    |                                                                    |

Notes:  
1. Onshore natural gas processing plants submit semiannual reports in accordance with 40 CFR 60.5422a and §60.487a.

# Reciprocating Compressor Affected Facilities

§60.5420a(b)(4)

| Facility Name            | Equipment ID | Operations Tracking 60.5420a(b)(4)(i)                 |                      |                         |                                                                                                         | Deviations to Report? |
|--------------------------|--------------|-------------------------------------------------------|----------------------|-------------------------|---------------------------------------------------------------------------------------------------------|-----------------------|
|                          |              | How are you tracking Operations?<br>(Hours or Months) | Actual Time Reported | What is the start date? | What determined start date?<br>(startup, Sept. 18, 2015, or rod packing replacement whichever is later) |                       |
| Pike Compressor Facility | ENG-005      | Hours                                                 | 13,576               | 12/28/2017              | Rod Packing Change                                                                                      | No Deviations         |
| Pike Compressor Facility | ENG-006      | Hours                                                 | 7,492                | 10/1/2018               | Startup                                                                                                 | No Deviations         |
| Pike Compressor Facility | ENG-007      | Hours                                                 | 6,897                | 10/1/2018               | Rod Packing Change                                                                                      | No Deviations         |
| Pike Compressor Facility | ENG-008      | Hours                                                 | 6,847                | 10/1/2018               | Rod Packing Change                                                                                      | No Deviations         |

Pike Compressor Facility      Footnote 1      In the annual report submitted October 31, 2018, there was a clerical error classifying the "What determined start date?" of Unit 5 as "Startup". With this report, ETC corrects this reporting element to reflect "Rod Packing Change".

Pike Compressor Facility      Footnote 2      Units 1-4, flash gas compressors 1-2, and VRU compressor 1 are subject to NSPS 0000. Units 5-8 are subject to NSPS 0000a.

# Pneumatic Controller Affected Facilities

§60.5420(b)(5) and §60.5420a(b)(5)

| Controller ID Number                                                                                                                                                                                   | Facility Name | State | Location | Make | Model | Month-Year Constructed | Month-Year Replaced |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-------|----------|------|-------|------------------------|---------------------|
| REPORTING PERIOD 8/2/2018 TO 8/2/2019:                                                                                                                                                                 |               |       |          |      |       |                        |                     |
| i) The station did not commence construction of any gas-actuated continuous bleed pneumatic controller affected facilities during the reporting period.                                                |               |       |          |      |       |                        |                     |
| ii) The station did not commence construction for any gas-actuated continuous bleed pneumatic controllers utilizing the functional need exemption of 40 C.F.R. 60.5390(a) during the reporting period. |               |       |          |      |       |                        |                     |
| iii) No deviations occurred during the reporting period.                                                                                                                                               |               |       |          |      |       |                        |                     |
|                                                                                                                                                                                                        |               |       |          |      |       |                        |                     |
|                                                                                                                                                                                                        |               |       |          |      |       |                        |                     |
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